

REMARKS

The Examiner rejected claims 1 and 8-20 under 35 U.S.C. § 103(a) as being unpatentable over Mann (U.S. Patent No. 4,691,801) in view of Cole (U.S. Patent No. 6,050,116), rejected claims 2, 3, 21, 22, 27-31, 33 and 34 under 35 U.S.C. § 103(a) as being unpatentable over Mann, as applied to claim 1, further in view of Kee, et al. (U.S. Patent No. 6,338,534) and rejected claims 6, 7, 25, 26 and 32 under 35 U.S.C. § 103(a) as being unpatentable over Mann, as applied to claim 2, in view of Mor, et al. (U.S. Patent No. 5,378,929). In response, the Applicant has deleted certain claims, amended other claims and has set forth arguments supporting the patentability of the claims in view of the cited references. The Applicant believes the amendments made in response to the Examiner's rejections have placed the application in position for allowance.

Deletion of Inventor

Initially, the present amendment cancels certain claims pertaining to a specific structure of the door locking device set forth in the trailer locking system invention. These claims are being cancelled in light of the Cole reference cited by the Examiner. Pursuant to 37 CFR § 1.48, the cancellation of these claims necessitates the deletion of the inventor Gregory B. Moore from the present application as his only contribution to the claims was the specific structure of the door locking device set forth in the cancelled claims. A separate Request to Delete Inventor is included herewith and signed by the attorney of record for the present application. The remaining inventor, John P. Holt, is the sole inventor of the non-cancelled claims and the new claims set forth in the present amendment.

Amendment to the Specification

The paragraph beginning at page 25, line 17 is being replaced to clarify that the microprocessor is part of the controller unit 20, as set forth in the remainder of the paragraph and elsewhere, not that the microprocessor is identified as reference numeral 20.

1 Amendments to the Claims

2 Applicant has amended claims 1, 20, 21, 26 and 31 to clarify the scope of the present
3 invention and to more clearly distinguish the present invention from the prior art. Specifically,
4 Applicant is amending these claims as set forth below:

5 a) claim 1 - Amending this claim to clarify that the controller unit of the present invention is
6 configured to automatically place the trailer's brakes in the locked condition based on one or more
7 pre-selected criteria. This amendment is supported by the text at least at page 28, line 1-17. As set
8 forth therein, in the preferred embodiment the pre-selected criteria is a predetermined pressure amount
9 that is compared to the pressure in the brake line.

10 b) claim 20 - Amending this claim to clarify that the wireless communications network which
11 transmits the signals from/to the communication system can be a satellite, cellular and/or radio
12 communications.

13 c) claim 21 - Amending this claim to add the pressure sensor limitation of claim 25 (which was
14 dependent on claim 21, but is being cancelled herein), to delete the text pertaining to the specific
15 configuration of the door lock device and to add text to clarify that the controller unit of the present
16 invention is configured to automatically place the trailer's brakes in the locked condition based on one
17 or more pre-selected criteria (as set forth for claim 1 above).

18 d) claim 26 - Amending this claim to now depend from claim 21 instead of cancelled claim 25,
19 which is being incorporated into independent claim 21 herein.

20 e) claim 31 - Amending this claim to add the limitation that the pressure sensors measure the
21 air pressure at the control valve to determine a measured pressure amount, delete the text regarding
22 the door lock device, add text to clarify that controller unit of the present invention is configured to
23 automatically place the trailer's brakes in the locked condition based on one or more pre-selected
24 criteria (as set forth for claim 1 above) and add the limitation that the controller unit comprises one or
25 more control codes configured to allow operation of the brake lock device (support for this limitation
26 is found at the following page/line locations: 25/17-26/11, 28/17-29/14, 48/5-49/5 and 50/5-50/7).

27 RESPONSE/AMENDMENT

Appl. # 10/690,256

1 Cancelled Claims

2 a) claims 10-18, 27-30 and 33-34 - These claims are being cancelled as being directed to a
3 specific structure of a door lock device. The deleted inventor, Gregory B. Moore, only contributed to
4 these claims.

5 b) claim 25 - This claim is being deleted because the limitations thereof are being incorporated
6 into claim 21, from which it originally depended, herein.
7

8 New Claims

9 a) claim 35 - This claim, which is dependent from claim 19, adds the limitation that the
10 controller unit comprises one or more control codes that allow operation of the brake and/or door
11 locking devices and that the communication system is configured for remote modification of the
12 control codes. Support for this claim is found at the following page/line locations: 25/17-26/11,
13 28/17-29/14, 48/5-49/5 and 50/7-50/10.

14 b) claim 36 - This claim, which is dependent from claim 35, adds the limitation that the
15 communication system is configured to allow remote operation of the brake and/or door locking
16 devices. Support for this claim is found at the following page/line location: 48/5-49/5.

17 c) claim 37 - This claim, which is dependent from claim 36, adds the limitation that the
18 communication system is configured to send an outgoing signal acknowledging commands entered at
19 the controller unit or the control mechanism and whenever the control codes are modified. Support
20 for this claim is found at the following page/line location: 49/18-50/10.

21 d) claim 38 - This claim, which is dependent from claim 22, adds the limitation that the
22 wireless communications network which transmits the signals from/to the communication system can
23 be a satellite, cellular and/or radio communications. Support for this claim is found at the following
24 page/line locations: 47/18-48/8 and 49/6-50/10.
25
26

1 e) claim 39 - This claim is the same limitation as new claim 35, which is ultimately dependent
2 from independent claim 1, except claim 39 depends from claim 22 (which depends from independent
3 claim 21).

4 f) claim 40 - This claim is the same limitation as new claim 37, which ultimately depends from
5 independent claim 1, except claim 40 depends from new claim 39 (which ultimately depends from
6 independent claim 21).

7 g) claim 41 - This claim, which is dependent from independent claim 31, adds the limitation
8 that the pre-selected criteria is a predetermined pressure amount and the controller is configured to
9 open the control valve when the measured pressure is less than that predetermined pressure amount.
10 Support for this claim can be found at the following page/line location: 28/1-17.

11 h) claim 42 - This claim, which is dependent from independent claim 31, adds the limitation
12 that the communication system is configured to allow remote operation of the brake lock device.
13 Support for this claim can be found at the following page/line location: 48/5-49/5.

14 I) claim 43 - This claim is the same limitation as new claim 37, which ultimately depends from
15 independent claim 1, except claim 43 depends from independent claim 31).

16 j) claim 44 - This claim, which is dependent from claim 31, adds the limitation that the
17 communication system is configured for remote modification of the control codes. Support for this
18 claim is found at the following page/line locations: 48/5-49/5 and 50/7-50/10.

19 k) claim 45 - This claim, which is dependent on new claim 44, adds the limitation that the
20 communication system is configured to send an outgoing signal if the control codes are changed.
21 Support for this claim can be found at the following page/line location: 50/5-10.

22 l) claim 46 - This claim is the same limitation as new claim 38, which is ultimately dependent
23 from independent claim 21, except claim 46 depends from independent claim 31.

24 m) claim 47 - This claim adds the limitation that the door lock system of independent claim 31
25 further comprises a door lock device. This limitation, which is in independent claims 1 and 21, was
26 removed from claim 31 in the amendment to that claim described above.

1 n) claim 48 - This claim, which is dependent from new claim 47, adds the limitation that the
2 control codes are configured to operate the brake and/or door lock devices and the communication
3 system is configured for remote modification of the control codes. Support for this claim is found at
4 the following page/line locations: 48/5-49/5 and 50/7-50/10.

5 o) claim 49 - This claim, which is dependent from new claim 48, adds the limitation that the
6 communication system is configured to allow remote operation of the brake and/or door lock devices.
7 Support for this claim can be found at the following page/line location: 48/5-49/5.

8 p) claim 50 - This claim, which is dependent from new claim 49, adds the same limitation as
9 set for in new claim 37.

10
11 Rejection under 35 U.S.C. § 103(a)

12 With regard to the obviousness rejections for Applicant's patent application, Section
13 103(a) only denies patentability to those inventions whose "subject matter as a whole would have been
14 obvious at the time the invention was made to a person having ordinary skill in the art to which said
15 subject matter pertains." (35 U.S.C. § 103.) The teachings from the prior art utilized to determine
16 obviousness must be reasonably pertinent to the problems solved by Applicant's invention. (See In re
17 Clay, 23 USPQ2d 1058, 1060 (CAFC 1992).) If the subject matter and purpose of Applicant's
18 invention are different from the subject and purpose of the invention described in a prior art reference,
19 it would be improper to utilize that reference in the obviousness analysis as a person skilled in the art
20 would not have been motivated to look to or consider such a reference in attempting to solve the
21 problems solved by Applicant's invention. (See In re Clay, 23 USPQ2d at 1061.) Under such
22 circumstances, a person having ordinary skill in the art would not apply the teachings of the prior art
23 to arrive at Applicant's invention. (Id.)

24 Even if certain prior art references are considered analogous art, there must be
25 something in these references that suggests combining their teachings in order to reject claims under
26 the obviousness standard. As stated by the court in In re Geiger, 2 USPQ2d 1276 (CAFC 1987),

1 “[o]bviousness cannot be established by combining the teachings of the prior art to produce the
2 claimed invention, absent some teaching, suggestion or incentive supporting the combination.” (In re
3 Geiger, 2 USPQ2d at 1278.) The motivation or suggestion to combine references must exist,
4 otherwise the determination of obviousness involves nothing more “than indiscriminately combining
5 prior art.” (Micro Chemical Inc. v. Great Plains Chemical Co., 41 USPQ2d 1238, 1244 (CAFC
6 1997).) In In re Fritch, 23 USPQ2d 1780 (CAFC 1992), the Federal Circuit stated the following:

7
8 In proceedings before the Patent and Trademark Office, the Examiner bears the burden of
9 establishing a prima facie case of obviousness based upon the prior art. The Examiner can
10 satisfy this burden only by showing some objective teaching in the prior art or that knowledge
generally available to one of ordinary skill in the art would lead that individual to combine the
relevant teachings of the references.

11 Obviousness cannot be established by combining the teachings of the prior art to produce the
12 claimed invention, absent some teaching or suggestion supporting the combination. Under
13 section 103, teachings of references can be combined *only* if there is some suggestion or
14 incentive to do so. Although couched in terms of combining teachings found in the prior art,
the same inquiry must be carried out in the context of a purported obvious "modification" of
the prior art. The mere fact that the prior art may be modified in the manner suggested by the
Examiner does not make the modification obvious unless the prior art suggested the desirability
of the modification.

15 Here, the Examiner relied upon hindsight to arrive at the determination of obviousness. It is
16 impermissible to use the claimed invention as an instruction manual or "template" to piece
17 together the teachings of the prior art so that the claimed invention is rendered obvious. This
18 court has previously stated that one cannot use hindsight reconstruction to pick and choose
among isolated disclosures in the prior art to deprecate the claimed invention. (In re Fritch, 23
USPQ2d at 1783-84 (internal quotes and citations removed).)

19 The above principles are applied to the Examiner's rejections of the various claims set
20 forth in the Office Action. As set forth below, it is Applicant's position that the currently pending
21 claims are not obvious in light of the prior art.

22
23 Claims 1 and 8-20

24 The Examiner rejected claims 1 and 8-20 under 35 U.S.C. § 103(a) as being
25 unpatentable over Mann in view of Cole, stating that Mann discloses a brake lock device, door lock
26 device, control unit and control mechanism, but not the details of the door lock device, which are

1 taught by Cole. In this amendment, the Applicant has cancelled the claims pertaining to the details of
2 the door lock device set forth in the patent application (which necessitated the deletion of the inventor)
3 in response to the Examiner's rejection. As set forth above, the Applicant has amended claim 1 to add
4 the limitation that the controller unit is configured to automatically place said brakes in the locked
5 condition based on one or more pre-selected criteria. The Applicant believes that the amendments
6 made to claim 1 distinguish it from the prior art cited by the Examiner.

7 Mann discloses a vehicle protection device comprising a selector panel 14 connected to
8 a master control unit 16 to operate various locking devices and alarms, collectively identified as 18,
9 that in one embodiment includes electrically operated bi-stable valves to prevent repressurization of
10 the pneumatic parking brake system. (Col. 3, lines 53-58 & Col. 4, lines 61-64.) As noted by the
11 Examiner, in alternative embodiments the locking devices could include a door locking system. (Col.
12 7, lines 5-10.) A infrared detector 32 in the selector panel 14 receives, amplifies and modulates light
13 signal from a transmitter 12 for use in the master control unit 16 to control the locking devices 18.
14 (Col. 4, lines 2-7 & 27-37.) In operation, the operator selects which locking mechanism(s) 18 he or
15 she wishes to engage by pushing the appropriate button on the selector panel 14 and then activates the
16 locking system(s) by pointing transmitter 12 at selector panel 14 and depressing switch 30 on
17 transmitter 12 to transmit infrared light signals to detector 32 for processing by control unit 16. (Col.
18 7, lines 3-29.) After appropriate codes are compared and the operation authorized, the
19 microprocessor causes the selected locking mechanism(s) to change from its existing state to its
20 opposite state (i.e., locked to unlocked). (Col. 7, lines 32-43.) The vehicle locking device of Mann is
21 clearly a manually operated locking system that is highly dependent on the operator, requiring him or
22 her to perform at least two separate functions before locking or unlocking the chosen system. For
23 instance, to place the vehicle braking system in the locked condition, the operator must first manually
24 select the brake system by pushing the appropriate button on selector panel 14 to engage the system,
25 manually point the transmitter 12 at the selector panel 14 and then depress switch 30 to transmit the
26 infrared signal to the selector panel 14. Naturally, if the operator forgets to do or improperly does

1 any of these steps, then the brake locking system will not be engaged, allowing the vehicle to be easily
2 moved by an authorized person. As set forth in more detail below, the amended claims of the present
3 application are clearly directed to a system having a brake lock device that automatically places the
4 brakes in their locked condition based one or more pre-selected criteria (in the preferred embodiment,
5 this is accomplished by the use of pressure sensors that measure/detect the drop in pressure in the
6 brake lines that results from setting the vehicle's parking brake).

7 Cole discloses trailer door locking device 101 that is mounted on the inside of trailer
8 door 103 to secure the doors 103 and 105 from opening (due to the removal of the limitations and the
9 cancellation of claims directed to the specific configuration/operation of the door lock device of the
10 present invention, the details of door locking device 101 are not further discussed). (Col. 2, lines 41-
11 52.) The door locking device 101 is activated by a remote unit, described as being similar to a remote
12 control for a garage door opener or car door opener, that generates an operating signal which causes
13 the door locking device 101 to lock or unlock. (Col. 3, lines 31-45 and 60-65.) An electrical timer
14 device is utilized to keep the door 103 in the locked condition if it is not actually opened within a
15 preset amount of time after the open signal is transmitted to the door locking device 101. (Col. 3,
16 lines 45-60.) The trailer locking device 101 of Cole is not directed to a brake lock device and, like
17 the Mann patent, requires the operator to lock the door 103 by activating the remote unit.

18 The claims of the present invention disclose a system for preventing the unwanted
19 movement of a trailer and the unauthorized access to the interior of the trailer that has a controller unit
20 which is configured to automatically place the brakes in their locked condition based on one or more
21 pre-selected criteria. In the preferred embodiment, this is accomplished by utilizing one or more
22 pressure sensors to measure the pressure in the pneumatic brake line between the air-operated brakes
23 and the supply of compressed air used to operate the brakes. The pressure sensors electronically
24 communicate the pressure information to the controller unit which compares the measured value to a
25 pre-determined value. Once the measured pressure in the brake line drops below the pre-determined
26 value, the controller unit sends a signal to the control valve to open, which causes any further

1 introduction of air into the brake system to vent through the control valve. The removal of air from
2 the brake system of the trailer automatically sets the trailer's brakes, preventing rolling movement of
3 the trailer, until sufficient air pressure is introduced into the system to release the brakes. Once the
4 control valve is placed in the open condition, any pressurized air that is attempted to be introduced
5 into the system will vent out the control valve, thereby preventing release of the brakes from their
6 locked condition. Because the opening of the control valve by the controller unit is automatic, based
7 on the pressure drop, there is no concern that the driver will forget or decide not to set the locking
8 device. When authorized movement of the trailer is desired, a signal is sent by the control mechanism
9 (i.e., via keypad, radio control, cellular, satellite or etc.) to the controller unit, which then sends a
10 close signal to the control valve to cause it to close. When the control valve closes, air pressure can
11 be built-up again in the brake line from the source of compressed air. The pressure in the brake line
12 releases the trailer's brake to allow rolling movement of the trailer. For safety purposes, the pressure
13 sensors monitor the air pressure in the brake lines to maintain the control valve in a closed condition
14 as long as the pressure is above the pre-determined level (meaning that a vehicle having compressed
15 air is hooked up to the trailer). The unlocking operation of the present system is controlled by the use
16 of various control codes that close the control valve to unlock the trailer or, in circumstances requiring
17 forced setting of the system, lock the brakes. Also in the preferred embodiment, the control unit is
18 connected to a communication system that allows remote monitoring and control of the brake and door
19 lock system, including the changing of security codes and the sending of an outgoing signal that
20 acknowledges commands entered at the controller unit.

21 Applicant believes that none of the prior art cited by the Examiner or otherwise
22 identified with regard to the present application describe, teach, suggest or offer any incentive for a
23 brake locking device that automatically places the brakes in the locked condition, without requiring
24 any input by the driver/operator of the vehicle, when the pressure in the brake line drops below a pre-
25 determined level (such as when the vehicle's parking brakes are set). (See In re Geiger, 2 USPQ2d at
26 1278.) The automatic locking of the brakes is believed to be a significant improvement over the prior

1 art trailer locking systems and, specifically, renders claim 1 not obvious in light of the Mann and Cole
2 patents. Absent hindsight, there is no simply no reason to modify the Mann and/or Cole patents to
3 provide for the automatic brake locking set forth in Claim 1, as modified herein, of the present
4 invention. (See In re Fritch, 23 USPQ2d at 1783-84.)

5 With regard to claims 8-9 and 19-20, the Examiner does not specifically identify what
6 in the prior art renders these claims obvious. Particularly as pertains to claims 19 and 20, there is
7 nothing in the prior art that appears to render these claims, which are directed to the use of a
8 communication system operatively connected to the controller unit for the transmission of signals
9 across a satellite, cellular and/or radio communications network, obvious under the appropriate
10 standards of 35 U.S.C. § 103(a).

11
12 Claims 2, 3, 21, 22, 27-31, 33 and 34

13 The Examiner rejected claims 2, 3, 21, 22, 27-31, 33 and 34 under 35 U.S.C. § 103(a)
14 as being unpatentable over Mann, as applied to claim 1, further in view of Kee, et al. As noted by the
15 Examiner, Mann does not disclose opening the valve to vent the air pressure to lock the brakes,
16 instead disclosing closing a valve to lock the brakes. The Examiner takes the position that Kee
17 teaches opening a valve to vent the air pressure to lock the brakes and that it would have been obvious
18 to modify Mann to open a valve to vent the air pressure to lock the brakes as taught by Kee in order to
19 reduce the number of steps to secure the trailer. As with above set of claims, certain of the
20 Examiner's comments are directed to claims that are being cancelled herein.

21 Kee discloses a theft prevention system for trailers that utilizes an electrically powered
22 spring biased solenoid valve 17 and signal receiver 18 to prevent the unauthorized movement of trailer
23 11 after it has been parked and disconnected from the tractor 8. (Col. 5, lines 2-19.) The driver of an
24 authorized vehicle is provided with a transmitter 22 that transmits a coded signal to receiver 18 to
25 operate solenoid valve 17 and release the trailer's parking brakes. (Col. 5, lines 20-28.) A driver
26 control element 21 provides extra security by requiring an access limiting device to be operated to

1 initiate the signal from transmitter 22 to signal receiver 18. (Col. 5, lines 39-59.) The operation of
2 solenoid valve 17 is controlled by actuator 41 to move disc 49 between the inlet 44 and outlet 45 to
3 release the trailer's brakes. (Col. 6, lines 32-53.) Kee does not describe the use of a controller unit
4 and no such type of device is necessary with the system described in the Kee patent. With regard to
5 claims 2, 3, 21 (as amended) and 31 (as amended), nothing in Mann or Kee teaches, suggests or offers
6 any incentive for the use of controller unit to control a control valve so as to automatically place the
7 brakes in the locked condition based on one or more pre-selected criteria, as set forth in the claims of
8 the present application. (See In re Geiger, 2 USPQ2d at 1278.) Specifically, nothing in either Mann
9 or Kee suggests or offers any incentive, absent hindsight, to combine the teachings of these patents to
10 disclose the invention set forth of claims 2, 3, 21 and 31 of the present invention, even assuming such
11 combination discloses the invention of these claims. (See In re Fritch, 23 USPQ2d at 1783-84.) As
12 set forth above, Mann teaches a manual system requiring significant input by the driver/operator and
13 Kee teaches the use of a spring actuated solenoid unconnected to a control unit. Respectfully, there is
14 nothing in either of these two patents, or any other prior art, that suggest combining them in the
15 manner suggested by the Examiner and such combination would not produce the invention described
16 in the present application. Applicant does not believe that claims 2, 3, 21 and 31 are obvious in light
17 of the prior art.

18 With regard to the communication systems of claims 22 and 31, the Examiner does not
19 specifically identify any prior art that renders these claims obvious. Nothing in Mann, Cole or Kee
20 disclose the communication systems set forth in these claims. As such, Applicant does not believe that
21 these claims are obvious in light of the prior art.

22
23 Claims 6, 7, 25, 26 and 32

24 The Examiner rejected claims 6, 7, 25, 26 and 32 under 35 U.S.C. § 103(a) as being
25 unpatentable over Mann, as applied to claim 2, in view of Mor, et al. As noted by the Examiner,
26 Mann does not disclose the use of pressure sensors to measure the pressure in the line and control the

1 actuation of the valve. According to the Examiner, however, Mor teaches the use of a pressure sensor
2 to measure the pressure in the line and control the actuation of the valve and it would have been
3 obvious to use the pressure sensor of Mor in the system taught by Mann, as modified, to prevent the
4 accidental actuation of the control while the vehicle is moving.

5 Mor discloses the use of a trailer anti-theft device that includes a control valve disposed
6 in series with the service line or the supply line and the service line. (Figures 2a & 2b; Col. 4, line 66
7 to Col. 5, line 6.) In one embodiment, Mor discloses the use of a pressure sensor 570 positioned after
8 (i.e., downstream) of the control valve 560 to send a signal to the command unit 520 to engage the
9 anti-theft device. (Col. 6, lines 4-13.) One problem with the device of Mor, is that it is dependent on
10 the tractor's power system to operate, which renders it unusable in the real world due to the fact that
11 drivers commonly disconnect the power before disconnecting the air lines, thereby leaving the device
12 of Mor unlocked. In addition, Mor does not utilize a brake line output to deliver the air pressure to
13 the control valve or the use of one or more pressure sensors operatively engaged with the control
14 valve (i.e., at the control valve) to measure the pressure of the brake line between the input and output
15 (vent) of the control valve. Positioning of the control valve in series with the service and/or supply
16 line creates logistical and operational difficulties not encountered with Applicant's invention, including
17 the lack of flexibility with regard to positioning of the brake lock device in the trailer. With regard to
18 Applicant's invention, Mor does not function in the manner of Applicant's invention to accomplish the
19 objectives of Applicant's invention. Specifically, because the control valve is in series with the
20 service and supply lines and the pressure sensor is positioned after the control valve, the anti-theft
21 device of Mor will not operate in the manner of Applicant's invention and will not have the fail-safe
22 attributes of Applicant's invention. For instance, positioning the pressure sensor(s) at the control
23 valve between its input and output allows the system to be safer with regard to not engaging the brakes
24 (i.e., locking them) when the trailer is in motion, which could be very dangerous, if not life
25 threatening. This is the very reason that the Applicants configured his trailer locking device as set
26 forth in the claims.

1 Nothing in Mann or Mor teaches, suggests or offers any incentive for the use of
2 controller unit to control a control valve operatively engaged with one or more pressure sensors so as
3 to measure the air pressure and automatically place the brakes in the locked condition based on one or
4 more pre-selected criteria (i.e., a predetermined pressure level), as set forth in the claims, as
5 modified, of the present application. (See In re Geiger, 2 USPQ2d at 1278.) Specifically, nothing in
6 either Mann or Mor suggests or offers any incentive, absent hindsight, to combine the teachings of
7 these patents to disclose the invention set forth of claims 6, 7, 21 (now incorporating claim 25), 26
8 and 32 of the present invention, even assuming such combination discloses the invention of these
9 claims. (See Micro Chemical, 41 USPQ2d at 1244; In re Fritch, 23 USPQ2d at 1783-84.) As set
10 forth above, Mann teaches a manual system requiring significant input by the driver/operator and Mor
11 teaches the use of pressure sensors downstream of the control unit. Respectfully, there is nothing in
12 either of these two patents, or any other prior art, that suggest combining them in the manner
13 suggested by the Examiner and such combination would not produce the invention described in the
14 present application. Applicant does not believe that claims 6, 7, 21, 26 and 32 are obvious in light of
15 the prior art.

16 In light of the above amendments and arguments, Applicant respectfully requests the
17 Examiner to withdraw the rejection of the remaining claims set forth in the subject patent application.

18 Applicant's original application included fees for three independent claims and a total of
19 thirty-four claims. Sixteen claim are being deleted by this amendment and sixteen claims are being
20 added, resulting in a total of thirty-four claims and three independent claims. As a result, no
21 additional fees for claims are believed due.

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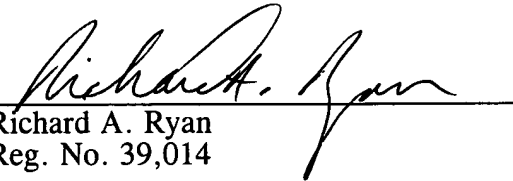
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1 In view of the foregoing, it is submitted that this application is in condition for
2 allowance. Reconsideration of the rejections and objections in light of this Amendment is requested.
3 Applicant believes that the amended claims are in condition for allowance. Allowance of claims 1-9,
4 19-24, 26, 31-32 and 35-50 is respectfully solicited.

5
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